

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

NANCY R., pseudonymously,

Plaintiff,
v.

PLAZA HOTELS, LLC, et al.,
Defendants.

Case No.: 5:25-cv-462

Judge Charles B. Goodwin

**UNOPPOSED MOTION TO STAY
BRIEFING ON DEFENDANT
MICHAEL WILEY’ S PENDING
MOTION TO DISMISS**

**UNOPPOSED MOTION TO STAY BRIEFING REGARDING
DEFENDANT WILEY’S MOTION TO DISMISS**

Plaintiff Nancy R. (“Nancy” or “Plaintiff”), by and through her undersigned attorney, respectfully moves the Court to stay briefing on Wiley’s Motion to Dismiss (Doc. 87) until after the Court decides Plaintiff’s Motion to Amend/Correct (Doc. 58).

On May 28, 2025 Plaintiff filed a Motion to Amend/Correct her complaint (Doc. 58). On July 10, 2025 Wiley filed a Motion to Dismiss (Doc. 87). Plaintiff’s response to Wiley’s Motion to Dismiss is currently due on July 24, 2025. Counsel for Plaintiff and counsel for Wiley have conferred, and Defendant Wiley does not object to the Plaintiff’s request to stay briefing on the Motion to Dismiss until Plaintiff’s Motion to Amend/Correct is granted or denied.

If the Court grants Plaintiff’s motion for leave to amend, then the parties agree that Wiley’s Motion to Dismiss will be automatically mooted, and Wiley will have fourteen (14) days to file his responsive pleading to the Amended Complaint pursuant to the Federal Rules of Civil Procedure.

If the Court denies the Plaintiff's Motion for Leave to Amend, Plaintiff requests that her response to Wiley's pending Motion to Dismiss be due 21 days after the Court's Order.

In this way, the parties hope to conserve judicial resources by enabling Plaintiff to respond to all motions to dismiss directed to her Amended Complaint in a single omnibus brief.

Good cause exists to grant the requested stay because it will conserve both the parties' and this Court's resources. The Court should therefore stay briefing on Michael Wiley's pending motion to dismiss.

Dated: July 22, 2025

Respectfully submitted,

s/ Geoffrey C. Parker
Geoffrey C. Parker, Esq.
Pro hac vice
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CERTIFICATE OF SERVICE

I hereby certify that on July 22, 2025 I filed the attached document with the Clerk of Court and served the attached document by regular mail on the following, who are not registered participants of the Electronic Case Filing System:

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/s/ Geoffrey C. Parker

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